

Alison Mutch  
Senior Coroner for the Coroner Area of Greater Manchester South  
HM Coroner Manchester South

By email only

14 November 2023

Dear Ms Mutch,

Thank you for your letter regarding the sad death of Sandra Curran in July 2022. We write in response to your Regulation 28 Prevention of Future Deaths report. We have carefully reviewed the report and your request for action.

I thought it would be helpful to firstly outline the purpose and role of ABTA. We are a trade association representing and providing services to our members, who make up a significant part of the UK travel industry and who sell a range of travel services including package holidays, flights, accommodation, and car hire. ABTA provides services to consumers through our customer support and arbitration services which deal with a range of consumer issues involving ABTA members.

ABTA also fulfils a self-regulatory role in respect of its members through its Code of Conduct and financial protection mechanisms. Concerning health, safety and security, we provide guidance to members and raise awareness on safety issues with consumers and destination authorities.

I should point out, however, that there are many travel providers who are not ABTA members. Any company that is not an ABTA member would not have access to the advice and guidance we provide to our members on health and safety matters, or other topics. In addition, UK travellers could visit Malta without using a UK travel agent or tour operator (either ABTA member or otherwise) to make their travel arrangements.

ABTA regularly convenes a committee of Health and Safety leads from UK tour operators. We bring them together to discuss and review incidents and issues that consumers have faced while on holidays, using evidence-based information to shape guidance to members and consumers. We also work with consultants and external stakeholders, such as the FCDO, to help consumers avoid issues overseas.

You draw attention in section 5 of your report to challenges that the sea around the coast in Malta could present to a weak swimmer, and suggest that a more proactive approach by UK tour operators highlighting the risk of getting into difficulties and how to mitigate them would reduce the risk of further deaths in circumstances such as Mrs Curran's. We note that your report is also addressed to the Foreign, Commonwealth & Development Office (FCDO).

ABTA's Code of Conduct says that before a contract is made members should advise their clients of the availability of any advice issued by the FCDO. The current travel advice for Malta (<https://www.gov.uk/foreign-travel-advice/malta>) contains the following information on the Safety and Security page:

### *Swimming safety*

*During the summer, most beaches are patrolled by lifeguards with a flag safety system. Make sure you understand the system and follow any warnings; red flags indicate dangerous or hazardous conditions. Swim within designated zones and take extra care if there are no lifeguards, flags or signs.*

*Follow local advice if there are jellyfish.*

*See more information from the [Malta Tourism Authority](#).*

ABTA runs a number of consumer campaigns where evidence from our members has highlighted that increased awareness on particular issues is important. We have been raising the importance of swim safety to consumers for over 20 years, and have been running a dedicated campaign on swim safety for around 10 years.

We usually run proactive PR and social media campaigns in advance of the summer and winter peak seasons which have in the past achieved broadcast, national and trade coverage. Our communications team also deals with many incoming enquiries throughout the year, often during the summer when holidaymaker accidents make the news.

We produce consumer safety information leaflets which highlight core safety and security advice. These leaflets are available to consumers who visit the ABTA website, and for our members to share with their customers, either in printable PDF or mobile-friendly format. By way of example, a news item from 30 June 2022, encouraged members to share these useful tips:

<https://www.abta.com/news/helping-keep-your-customers-safe-holiday>

<https://www.abta.com/tips-and-advice/staying-safe-on-holiday/safe-and-healthy-holidays-sun>

And in 2023, we used #WaterWise to promote updated swim safety advice:

<https://www.abta.com/news/abta-urges-holidaymakers-be-waterwise-summer>

<https://www.abta.com/tips-and-advice/staying-safe-on-holiday/swim-safe>

The messaging of the swim safe information includes the following: *“Even if you regularly swim in a pool, don't forget that open water swimming can be much more challenging”.*

Our members have a range of business models, so not all have representatives based in destination who would be able to offer advice on local conditions.

We remain committed to providing guidance on swim safety, through our website and social media campaigns. We will continue to work with our members and other stakeholders to make this guidance available to travellers.

We are not aware of the full facts in the specific case which is the subject of your report and therefore we are unable to comment on the particular circumstances surrounding the tragic death of Mrs Curran. We wish to offer our sincere condolences, through your office, to the family and friends of Sandra Curran.

Yours sincerely,

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**Chief Executive**